

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
Lynchburg (Charlottesville) Division**

In re:

Chassie Priscilla Bright

Debtor(s)

Case No. 22-60472-RBC
Chapter 13

**NOTICE OF HEARING ON DEBTOR'S
MOTION TO EXTEND SUSPENSION OF PLAN PAYMENTS**

YOU ARE HEREBY NOTIFIED that the Debtor, Chassie Priscilla Bright, by Counsel, John P. Goetz, Esq. of John Goetz Law PLC, has filed a Motion to Extend Suspension of Plan Payments.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the Motion, or if you want the court to consider your views on the Motion, then on or before **November 9, 2023** you must file with the court, at the address below, a written response pursuant to Local Rule 9013-1(M). If you mail your response to the court for filing, you must mail it early enough for the court to receive it on or before the date stated above.

Clerk of the Court
United States Bankruptcy Court
1101 Court St., Room 166
Lynchburg, VA 24504

You may also mail a copy of your response to:

John Goetz Law, PLC
86 W. Shirley Avenue
Warrenton, VA 20186

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief without the need to hold a hearing. If you file a response and you wish to be heard, you must attend the hearing to be scheduled on **November 16, 2023 at 09:30 a.m.** before Judge Connelly, to be held via ZoomGov, by accessing the following URL: <https://www.zoomgov.com/j/1603692643>, or by using Meeting ID 160 369 2643 when using the Zoom application.

Dated: 10/13/2023

/s/ John P. Goetz

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Counsel for the Debtors

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2023, a true copy of the foregoing Notice of Hearing on Motion to Suspend Payments was served via the CM/ECF system, to Angela M. Scolforo, Chapter 13 Trustee, to all creditors or parties in interest who have requested notice, and to the Debtors.

/s/ John P. Goetz
John P. Goetz

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MOTION TO EXTEND SUSPENSION OF CHAPTER 13 PLAN PAYMENTS

Chassie Priscilla Bright, by counsel, moves to extend the suspension of her Chapter 13 plan payments two additional months, for the months of November and December 2023, and to resume payments in January 2024, for a total suspension period of three months, with all suspended payments to be cured by the cumulative amount of the missed payments divided evenly over the remaining months of the plan and paid in addition to the regular payments, or, in the alternative, extending her plan term, if possible, and in support states as follows:

1. Debtor commenced this case with the filing of a voluntary petition on May 4, 2022.
2. On November 21, 2022, this Court entered an order confirming Debtors' Amended Chapter 13 Plan filed August 18, 2022. The Chapter 13 Plan required bi-weekly payments in the amount of \$248.59 for 60 months, in addition to funds on hand of \$538.56, for a total estimated base gross receipt of \$32,855.76. The Chapter 13 Plan proposes a 100% disbursement to non-priority unsecured claims.
3. On September 18, 2023, this Court suspended the Debtor's monthly Plan payments for one month – October 2023 – due to an illness that did not allow the Debtor to work.
4. Since the suspension was granted, the Debtor has suffered a physical injury that has increased the amount of time Debtor will not be able to work.
5. Debtor requests an extension of the original one-month suspension, for the month of October, to a total three-month extension – for the months of October 2023 through December 2023 - to allow her to regain employment and to reestablish her financial position.
6. Debtor intends to resume making payments in January 2024 and will submit orders that grants this motion, resolves the default created by the suspension, and will satisfy this Court, the Chapter 13 trustee, and all creditors.

WHEREFORE, the Debtor moves this Court, pursuant to Bankruptcy Rule 9014, to enter an Order extending the suspension of Debtor's Chapter 13 plan payments, for the months of

November and December 2023, for a total suspension period of three months, and to grant such other and further relief as it deems just and appropriate.

CHASSIE PRISCILLA BRIGHT
By Counsel

/s/ John P. Goetz
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Counsel for the Debtor

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2023, a true copy of the foregoing Motion was mailed to or electronically served via electronic case filing to all relevant creditors and parties in interest at their respective addresses as listed on the mailing matrix maintained by the clerk of the court and to the Chapter 13 Trustee via electronic case filing.

/s/ John P. Goetz
John P. Goetz